



April 1, 1999

U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, New Jersey 08837
Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866
Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal
Action, Index No. II-CERCLA-99-2006
Progress Report No. 2

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondent Cornell Dubilier Electronics, Inc. (CDE) and Dana Corporation (Dana), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between March 11, 1999 and March 24, 1999.

Completed Activities

During this period, the following activities were completed:

- Demonstration of Financial Assurance (see AOC Paragraph 92); submitted to USEPA prior to the effective date of the AOC.
- Preparation of an access agreement necessary to perform the required work on the seven residential properties (see AOC Paragraphs 36(a) and 60). Access agreements were sent by overnight mail to the owners of the seven properties on March 16, 1999.
- Preparation of the Sampling and Analysis Plan (SAP) for verification sampling (see AOC Paragraphs 36 and 37). The SAP was submitted to USEPA on March 17, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Identification of prospective contractors, including remediation contractors, surveyors and landscape contractors.
- Preparation of a schedule for activities required by the AOC.
- Preparation of the Removal Action Work Plan (see AOC Paragraphs 36 and 37).
- Identification of disposal facilities for excavated PCB-containing soils (see AOC Paragraphs 37b, 40 and 67).

Two-Week Schedule of Planned Activities

During the next two-week period (March 25, 1999 through April 7, 1999) the following activities are planned:

- Identification of prospective contractors, including remediation contractors, surveyors and landscape contractors.
- Completion of a schedule for activities required by the AOC.
- Completion of the access agreements with each of the seven residential properties owners (see AOC Paragraphs 36(a) and 60).
- Identification of disposal facilities for excavated PCB-containing soils (see AOC Paragraphs 37b, 40 and 67).
- Completion of the Removal Action Work Plan (see AOC Paragraphs 36 and 37) for submittal to USEPA.

One-Month Schedule of Planned Field Activities

During the next four-week period (March 25, 1999 through April 21, 1999), the following field activities are planned:

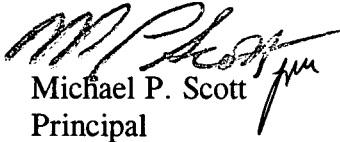
- Implementation of verification sampling on the seven properties as determined by the results of statistical data assessment using USEPA's data; sampling activities are anticipated to begin during the week of March 29, 1999. Implementation of sampling activities is contingent on receipt of USEPA approval of the SAP and the seven completed access agreements.

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- Surveying of property corners and existing landscape vegetation that may be impacted by removal action activities; survey activities are anticipated to begin during the week of March 29, 1999. Implementation of surveying activities is contingent on receipt of the seven completed access agreements.

Please call me or Mark Nielsen at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,


Michael P. Scott
Principal

MPS:jmn

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cc: R. Sanoff, Esq.
M. Last, Esq.